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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Internet Sports International, Ltd.,

Plaintiff,

v.

Amelco USA, LLC. et al.,

Defendants.

Case No.: 2:23-cv-00893-ART-NJK

**ISI'S MOTION TO SEAL ISI'S REPLY
IN SUPPORT OF ITS MOTION TO
ISSUE LETTER OF REQUEST FOR
INTERNATIONAL JUDICIAL
ASSISTANCE**

Pursuant to Local Rule IA 10-5, and the Court's order concerning the sealing of documents (ECF. No. 67), Plaintiff Internet Sports International, Ltd. ("ISI") moves for leave to file under seal its reply in support of ISI's motion to issue letter of request for international judicial assistance and two the exhibits thereto (Ex. Nos. 1 and 2). The brief refers and cites to deposition testimony of AUK witnesses Brandon Walker and Damian Walton, and excerpts from those depositions are attached as Exhibit Nos. 1 and 2. Because Amelco designated the entireties of

those transcripts under the Court's Protective Order as "attorneys' eyes only" ("AEO"), ISI files this motion.

ISI believes that no portion of the brief, nor the excerpts attaches as exhibits meets the Ninth Circuit's standard for sealing set forth in *Kamakana v. City & County of Honolulu*, 447 F.3d 1172 (9th Cir. 2006). ISI has filed under seal solely because Amelco has designated this material pursuant to the protective order.

Accordingly and pursuant to the Court's prior order, Amelco should, within seven days, submit either "(1) a declaration establishing sufficient justification for sealing each document at issue or (2) a notice of withdrawal of the designation(s) and consent to unsealing." ECF No. 67 at 2.

DATED: April 17, 2024

MCKOOL SMITH, PC

/s/ Travis DeArman

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that service of the foregoing was filed on April 17, 2024 via the Court's CM/ECF electronic filing system addressed to all Parties on the e-service list.

/s/ Travis E. DeArman
Travis DeArman